

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

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US BANKRUPTCY COURT  
DISTRICT OF DELAWARE

In re:

FTX TRADING LTD., et al., Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

EMERGENCY MOTION OF BHAVIKA CHUNAWALA FOR EXTENSION OF TIME  
TO RESPOND TO THE 193rd OMNIBUS OBJECTION

**Honorable Chief Judge Karen B. Owens:**

I, Bhavika Chunawala, respectfully submit this Emergency Motion for an Extension of Time with respect to the 193rd Omnibus Claim Objection (D.I. 31949), concerning my Proof of Claim No. 95770.

**BACKGROUND**

1. The current response deadline, as agreed earlier with the Trust, is October 19, 2025.
2. The Trust has now indicated via email dated November 08, 2025 that it "does not consent" to my requested extension and intends to proceed on the current schedule.
3. My prior request for extension was transmitted to the Clerk of Court by international courier and served by email to counsel; however, due to courier delays outside my control, the motion has not yet been docketed.

**GOOD-FAITH BASIS FOR EMERGENCY RELIEF**

4. I continue to face exceptional circumstances, including:
  - (a) My recent medical recovery and postpartum complications;
  - (b) Delays in obtaining authenticated records from international institutions;
  - (c) The need for certified translations of key documents;
  - (d) Ongoing consultation with my solicitor; and
  - (e) Forensic analysis of several disputed technical records.
5. These issues are legitimate, documented, and unavoidable. Without a brief extension, I will be severely prejudiced in presenting a complete and fair response.

**LEGAL GROUNDS**

6. Under Bankruptcy Rule 9006(b)(1), the Court may extend deadlines for "cause shown."

7. The U.S. Supreme Court in \*Pioneer Investment Services Co. v. Brunswick Associates Ltd. Partnership\*, 507 U.S. 380 (1993), recognizes extensions where excusable neglect or extraordinary circumstances exist.

8. Pursuant to 11 U.S.C. § 502(b), every claimant must be given a meaningful opportunity to present evidence.

9. Denial of additional time would violate my rights to procedural due process under the Fifth Amendment.

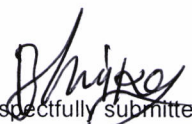
#### REQUESTED RELIEF

10. I respectfully request that the Court extend my current deadline of October 19, 2025 by an additional forty-five (45) to ninety (90) days, or such other period as the Court deems just and proper.

11. This request is made in good faith and not for delay, but for the purpose of ensuring fairness, accuracy, and due process.

WHEREFORE, I, Bhavika Chunawala, respectfully pray that the Court grant this Emergency Motion and extend the response deadline as requested.

Dated: November 19, 2025

  
Respectfully submitted,

/s/ Bhavika Chunawala

Claimant, Pro Se


Proof of Claim No. 95770

Address: Gujarat, India.

Email: bhavikacr@gmail.com

To:  
 Clerk of Court  
 United States Bankruptcy Court  
 District of Delaware  
 824 N. Market Street  
 Wilmington, DE 19801  
 United States

From:  
 Bhavika Chunawala  
 Inside Envelope:  
 Emergency Motion (signed)  
 "Please file the enclosed Emergency Motion."

 		INTERNATIONAL TRACKER PACKAGE SERVICE LPS10264261N
Destination Country Name & Code: United States of America (US)		
Booking Office: Falegari HQ (390002)		
Counter No. 1, 21-11-2025 16:15:23		
GST No. 244AAGS1316J121 BKPRFID: 103600302112507732		
Charged Weight (gms): 25 Fly Weight (gms): 25 Vol Weight (gms): N/A LINA B: N/A H: N/A		
Amount Paid: 472.00 (Base Tariff: Rs. 400 Tax: Rs. 72) (CGST: 36.00 SGST: 36.00)		
Mode of Payment: Cash		
<b>Sender</b> BHAVIKA CHUNAWALA Mobile No. 8140501421 VADODARA GUJARAT	<b>Receiver</b> CLERK OF COURT Mobile No. DELAWARE NEWARK	CHHOTAUDEPUR-391150 WILMINGTON-

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